

EXHIBIT B

Interrogatory No. 11:

Identify any and all fact witnesses upon whom you will rely at summary judgment or at trial in this litigation and any such witnesses' expected testimony.

Response:

Coalition Plaintiffs object to Interrogatory No. 21 as an improper compound interrogatory consisting of multiple discrete subparts. See Fed. R. Civ. P. 33(a)(1). Coalition Plaintiffs further object to this Interrogatory on the grounds that it prematurely seeks discovery of Plaintiffs' final witness list for trial.

Interrogatory No. 12:

Identify all "members" of the Coalition for Good Governance that are residents of the State of Georgia, the date their membership began, and (if applicable) the date their membership ended.

Response:

Coalition Plaintiffs object to this Interrogatory because it impermissibly seeks membership lists in violation of Coalition Plaintiffs' First Amendment rights.

Without waiving the foregoing objection, CGG responds that Plaintiff Megan Missett is a member of CGG. She joined the organization through an oral agreement in 2017 and continues to be a member.